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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation, and MULTNOMAH COUNTY, a political subdivision of the State,

DEFENDANTS.

3:20-cv-00917-HZ

DECLARATION OF NAOMI SHEFFIELD

(In Support of Defendant City of Portland's Motion for Extension of Time to Respond to Plaintiff's Supplementary Memo in Support of Their Motion for Finding of Contempt and for Sanctions)

I, Naomi Sheffield, being first duly sworn, do depose and say:

1. I am one of the attorneys representing the City of Portland in the above-entitled matter and I make this declaration in support of Defendant City of Portland's Motion for Extension of Time to Respond to Plaintiff's Supplemental Memorandum in Support of Plaintiffs' Motion for Finding of Contempt and for Sanctions (Docket 122), filed on July 13, 2020.

2. The City needs further time to investigate Oregon State Police troopers' involvement in policing the events of June 30, 2020. The City is unable to adequately respond to the supplemental facts without information from the Oregon State Police troopers.

3. Defendant City of Portland requests an extension of time, up to and including August 24, 2020 in order to obtain information from Oregon State Police and incorporate any relevant information into the City's response.

4. I received confirmation on July 17, 2020 from Plaintiffs' counsel that they have no objection to this request for an extension of time.

5. This motion is presented in good faith and not for reasons of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: July 16, 2020

/s/ Naomi Sheffield
Naomi Sheffield